

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
SCOTT S. REVER, ESQ., Subchapter V Trustee 110 Allen Road, Suite 304 Basking Ridge, New Jersey 07920 Tele: (973) 467-2700 SCOTT S. REVER, ESQ. (SR-1425)	
In Re: ASSUNCAO BROS., INC., Debtor.	Chapter 11 Case No.: 22-16159 CMG Honorable Christine M. Gravelle

**SECOND INTERIM APPLICATION FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES TO SUBCHAPTER V TRUSTEE,
SCOTT S. REVER, ESQ.**

TO: THE HONORABLE CHRISTINE M. GRAVELLE
UNITED STATES BANKRUPTCY JUDGE

The Application of Scott S. Rever, Esq., Subchapter V Trustee herein, respectfully states to the Court as follows:

1. On August 3, 2022, Assuncao Bros., Inc. filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.
2. On August 8, 2022, Scott S. Rever, Esq. (the "Trustee") was appointed to serve as Subchapter V Trustee.
3. The within Application represents the Trustee's Second Interim Application for Allowance of Fees as Subchapter V Trustee and covers the time period from November 1, 2022 through January 31, 2023.
4. Annexed hereto and made part hereof as Exhibit "A" are copies of the Trustee's computerized time sheets. These detail the services rendered by the Trustee, the hourly rate charged, and the actual time expended in the performance of such services. Said time sheets reflect that the Trustee has expended 14.30 hours in performing services, resulting in charges of \$6,435.00.

5. Annexed hereto and made part hereof as Exhibit "B" is a detailed breakdown of all out of pocket disbursements incurred in the performance of my duties as Subchapter V Trustee, which total \$135.00.

6. Annexed hereto and made part hereof as Exhibit "C" is the Affidavit of Scott S. Rever, submitted in accordance with the provisions of Section 504 of the Bankruptcy Code.

7. The services performed by applicant in its capacity as the Subchapter V Trustee included:

a. The Trustee reviewed the Debtor's status report filed with the Court and all monthly operating reports.

b. The Trustee reviewed and monitored creditor motions for relief from the automatic stay and the resolution thereof.

c. The Trustee had communications with debtor's counsel regarding the status of the case and plan.

d. The Trustee attended hearings in the case including a status conference and a motion to enforce the sale order entered in the case.

e. The Trustee reviewed the fee applications of debtor's counsel and financial advisor and had discussions with the debtor and the US Trustee's Office regarding same and the resolution of issues with respect thereto.

f. The Trustee reviewed the buyer's motion to enforce the sale order and reviewed all pleadings in connection therewith.

g. The Trustee reviewed the debtor's plan and entered order setting deadlines with respect to the plan.

8. In addition to the foregoing, your applicant respectfully directs the Court's attention to the detailed time records submitted herewith, which sets forth the specific services rendered.

9. I believe that these services were both necessary and beneficial to the estate.

WHEREFORE, Scott S. Rever, Esq., Subchapter V Trustee respectfully requests the entry of the annexed Order, granting a first interim allowance of compensation in the amount of \$6,435.00 together with reimbursement of actual out-of-pocket disbursements in the amount of \$135.00 for a total award of \$6,570.00.

Respectfully submitted,

Date: February 17, 2023

/s/ SCOTT S. REVER, ESQ.
SCOTT S. REVER, ESQ.
Subchapter V Trustee